

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ISIDRO RAMIREZ,

Plaintiff,

V.

**ALLSTATE VEHICLE AND PROPERTY
INSURANCE COMPANY,**

Defendant.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 3:16-CV-03006-B

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiff, Isidro Ramirez, hereby dismisses with prejudice all claims asserted herein against Defendant Allstate Vehicle and Property Insurance Company (“Allstate”), pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Therefore, Plaintiff’s claims against Defendant Allstate are hereby dismissed with prejudice as of this date of filing, with each party to bear its own costs, if any.

RESPECTFULLY SUBMITTED,

/s/ Derek L. Fadner *

James M. McClenny
State Bar No. 24091857
J. Zachary Moseley
State Bar No. 24092863
Derek L. Fadner
State Bar No. 24100081

MCCLENNY MOSELEY & ASSOCIATES, PLLC
411 N. Sam Houston Parkway E., Suite 200
Houston, Texas 77060
Telephone: (713) 334-6121
Facsimile: (713) 322-5953
Email: James@mma-pllc.com
Email: Zach@mma-pllc.com

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE – PAGE 1

Email: Derek@mma-pllc.com

ATTORNEYS FOR PLAINTIFF

**Signed with Permission*

And

/s/ R. Tate Gorman

Roger D. Higgins
State Bar No. 9601500
R. Tate Gorman
State Bar No. 24032360
Thompson, Coe, Cousins & Irons, LLP
Plaza of the Americas
700 N. Pearl Street, Twenty-Fifth Floor
Dallas, Texas 75201-2832
Telephone: (214) 871-8200
Facsimile: (214) 871-8209
rhiggins@thompsoncoe.com
tgorman@thompsoncoe.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that on July 27, 2018, a copy of this document was served to all Counsel of Record in accordance with the Federal Rules of Civil Procedure to:

James M. McClenny
J. Zachary Moseley
Derek Fadner
McCLENNY MOSELEY & ASSOCIATES, PLLC
411 N. Sam Houston Parkway E., Suite 200
Houston, Texas 77060
Principal Office No. 713-334-6121
Facsimile: 713-322-5953
James@mma-pllc.com
Zach@mma-pllc.com
Derek@mma-pllc.com

/s/ R. Tate Gorman

R. Tate Gorman